

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

v.

**JOSEPH CARAMADRE, and
RAYMOUR RADHAKRISHNAN**

Criminal No. 1:11-cr-00186-S

**JOINT MOTION TO CONTINUE
SENTENCING HEARING AND SUBMISSION DEADLINES**

Now come the Defendants, Joseph Caramadre and Raymour Radhakrishnan, through counsel, William J. Murphy, Esq., Randy Olen, Esq., and Olin Thompson, Esq., and respectfully request a four week continuance of the sentencing hearing, and submission deadlines attendant thereto in the above-referenced matter. Currently, Defendants' brief, exhibits, and witness list are due August 16; the restitution hearing before the Honorable Patricia A. Sullivan, Magistrate Judge is scheduled for August 22 at 10 a.m.; and Defendants' sentencing is currently scheduled for September 13 at 9:30 a.m. before the Honorable Judge William Smith.

For reason, all counsel require additional time to prepare materials and arguments in support of Defendants' positions. This case involves complicated financial calculations which require extensive analysis, which represents an area with which undersigned counsel are not ordinarily familiar. The fact that Mr. Caramadre is detained has made it far more difficult to prepare these calculations. In addition, Mr. Murphy has only recently entered his appearance in this case and needs this additional brief period of time in order to meaningfully assist in the sentencing process.

A continuance of four weeks in order to properly prepare these calculations regarding restitution, and otherwise prepare for the sentencing hearing, will cause no prejudice to the Government, and is in the interest of fair and just adjudication of this case.

Wherefore, Defendants respectfully request that the due date for their submission and the sentencing hearing itself be continued for a period of four weeks.

Respectfully submitted,
Joseph Caramadre,
By his attorneys,

/s/ William J. Murphy, Esq.

William J. Murphy, Esq.
Murphy and Fay, LLP
127 Dorrance Street, 2nd Floor
Providence, RI 02903
(401) 490-3200
(401) 490-3207 (fax)

/s/Randy Olen, Esq.

Randy Olen, Esq.
478A Broadway
Providence, RI 02909
(401) 274-1400
(401) 274-2480 (fax)

Respectfully submitted,
Raymour Radhakrishnan,
By his attorney,

/s/ Olin Thompson, Esq.

Olin Thompson, Esq.
Assistant Federal Public Defender
Federal Defender's Office
10 Weybosset Street, 3rd Floor
Providence, RI 02903
(401) 528-4281
(401) 528-4285 (fax)

CERTIFICATION

I hereby certify that on this 5th day of August, 2013, I caused to be delivered, via electronic delivery, the within ***Motion*** to:

John P. McAdams, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

Lee Vilker, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

/s/ William J. Murphy, Esq.
